

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

SHANIKA CROWLEY,

Plaintiff,

v.

FPI MANAGEMENT, INC., and
ELLEN RICHARDS,

Defendants.

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Case No. 24-cv-00544-CVE-MTS

THIRD UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants, FPI Management, Inc. and Ellen Richards, by counsel and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and the LCvR7-1(g), hereby move for an extension of time within which to file a responsive pleading to Plaintiff's Complaint. In support of this Unopposed Motion for Extension of Time, Defendants state the following:

1. On November 7, 2024, Plaintiff filed her initial Complaint. ECF. No. 1.
2. On November 12, 2024, the Court dismissed Plaintiff's Complaint for failure to state a claim. ECF No. 4.
3. The Court later granted Plaintiff's Motion to Reconsider, leading to Plaintiff filing her Amended Complaint on January 17, 2025. ECF Nos. 19, 21.
4. Defendants received service of the Amended Complaint on January 30, 2025. ECF. No. 28.
5. This Court previously granted Defendants' Second Unopposed Motion for Extension of Time to Answer. ECF Nos. 34, 35.
6. Defendants' current deadline to file a responsive pleading is April 21, 2025.

7. Counsel for Defendants has communicated with counsel for Plaintiff, who has agreed, and consents, to another extension of time for Defendants to file a responsive pleading until May 23, 2025.

8. Accordingly, Defendants respectfully move the Court to extend the deadline for responsive pleadings to May 23, 2025.

9. Two previous motions to extend this deadline have been made. ECF Nos. 29, 34

10. In the past month, parties have continued to engage in settlement discussions in earnest, and the requested extension of time will allow further discussions to occur.

11. As demonstrated by the fact that Plaintiff consents to this Motion and no Scheduling Order has been entered in the case, the requested extension will neither prejudice Plaintiff nor result in undue delay.

12. A proposed order has been submitted for the Court's consideration.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that the Court grant this Third Unopposed Motion for Extension of Time; enter an order extending the time for Defendants to file a responsive pleading to May 23, 2025; and grant such other relief the Court deems proper.

Dated: April 18, 2025

Respectfully submitted,

FPI MANAGEMENT, INC.
ELLEN RICHARDS

/s/ Brooks Cain
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